

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO, ET
AL.,

Defendants.

No. 12-cv-2039 (GAG)

**JOINT MOTION IN COMPLIANCE WITH
COURT'S ORDERS AT DKT. NOS. 564 AND 567**

COME NOW, Plaintiff, the United States of America, and Defendants, Commonwealth of Puerto Rico and the Puerto Rico Police Department (collectively, the Parties), and file the attached Stipulation on the Technical Compliance Advisor's Compliance Assessment Activities in the Field (Stipulation) in restricted mode for the Court's approval, in compliance with the Court's Orders of July 19 and 21, 2017. Dkt. Nos. 564, 567. For cause, the Parties state as follows:

1. On July 17, 2017, the Parties met with the Technical Compliance Advisor (TCA) to discuss the draft Stipulation regarding the compliance assessment activities of the TCA in the field. At the meeting, the TCA informed the Parties that this Court had ordered the Parties to file the Stipulation by July 19, 2017.

2. On July 19, 2017, the Commonwealth filed a motion for extension of time to file the Stipulation by July 21, 2017. Dkt. No. 563. The Court granted the extension. Dkt. No. 564.

3. On July 21, 2017, this Court entered a docket order pertaining to a separate matter involving the TCA's methodology for a study on crowd control policies and practices that reads, in pertinent part, as follows: "All filings pertaining to this, *or any pending matter*, until reviewed and ruled upon by the court shall be filed in restricted mode. This applies to the parties and TCA." Dkt. No. 567 (emphasis added). In compliance with the Court's Order and in an abundance of caution, the Parties file the attached Stipulation in restricted mode.

4. The Parties drafted the attached Stipulation in consultation with the TCA. The Parties held in-person discussions with the TCA and his staff on July 17, 2017 and July 20, 2017, in addition to exchanging written comments. The Parties believe that the Stipulation is consistent with the Agreement for the Sustainable Reform of the Puerto Rico Police Department, Dkt. No. 60, and carefully balances the needs and responsibilities of both the TCA and Puerto Rico Police Department.

WHEREFORE, the Parties respectfully request that this Honorable Court take notice of the above and approve the attached Stipulation.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 21st day of July, 2017.

<p>FOR PLAINTIFF UNITED STATES OF AMERICA:</p> <p>STEVEN H. ROSENBAUM Chief, Special Litigation Section</p>	<p>FOR DEFENDANTS COMMONWEALTH OF PUERTO RICO, ET AL.:</p> <p>WANDA VAZQUEZ GARCED Secretary of Justice</p> <p>WANDYMAR BURGOS VARGAS Deputy in Charge of General Litigation</p>
--	---

<p><u>S/LUIS E. SAUCEDO</u> TIMOTHY D. MYGATT Deputy Chief LUIS E. SAUCEDO (G01613) Counselor to the Chief BRIAN BUEHLER LYNDA GARCIA SETH WAYNE Trial Attorney U.S. Department of Justice Civil Rights Division Special Litigation Section 950 Pennsylvania Avenue, NW Washington, DC 20530 Tel: (202) 598-0482 Fax: (202) 514-4883 luis.e.saucedo@usdoj.gov Attorneys for Plaintiff</p>	<p>SUSANA PENAGARICANO BROWN Director Federal Litigation and Bankruptcy <u>S/JOEL TORRES ORTIZ</u> Joel Torres Ortiz U.S.D.C. NO. 302311 Federal Litigation Division Department of Justice P.O. Box 9020192 San Juan, P.R., 00902-0192 Tel. (787) 721-2900, ext.2647,2650,2624 Fax (787) 723-9188 joeltorres@justicia.pr.gov Attorneys for Defendants</p>
--	--

NOTIFICATION

On this date, the signatories to this motion have filed it with the Clerk of the Court via the CM/ECF that shall relay it to all attorneys of record.